



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE: TRIBUNE COMPANY  
FRAUDULENT CONVEYANCE  
LITIGATION

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THIS DOCUMENT RELATES TO:  
ALL MATTERS

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Consolidated Multidistrict Litigation  
11 MD 2296 (WHP)  
12 MC 2296 (WHP)

SCHEDULING ORDER

WILLIAM H. PAULEY III, District Judge:

An initial case management conference having been conducted on July 10, 2012,  
the following schedule is entered on consent:

1. Defendants in the Official Committee of Unsecured Creditors of Tribune Company, et al. v. FitzSimons, et al., 12 Civ. 2652 (WHP) (the "Committee Action") are directed to submit a proposed organizational structure comprised of an executive committee of counsel who will fairly represent each group of defendants in this multidistrict litigation whose interests are similarly aligned. See Manual for Complex Litig., § 10.221 (4th ed. 2004). The proposed organizational structure will be subject to this Court's approval and should be docketed on 12 MD 2296 by August 3, 2012. This Court appoints Grippo & Elden LLC to act as interim liaison counsel for defendants in the Committee Action.

2. If defendants in the Committee Action cannot agree on a proposed organizational structure, competing applications for executive committees should be docketed on 12 MC 2296 and all related actions and submitted to chambers no later than August 3, 2012.

3. Interim liaison counsel are directed to submit a proposed Master Case Order No. 3

consistent with this Court's directives by August 7, 2012. Where the parties cannot agree, they should submit alternative proposals for the Court's consideration. If necessary, the parties are permitted to submit letter memoranda in support of their respective positions.

4. Plaintiffs are directed to submit a letter memorandum outlining the limited discovery they now wish to pursue by July 26, 2012. Defendants shall submit a letter memorandum in response by August 16, 2012.

5. This multidistrict litigation and all consolidated actions remain stayed in all other respects.

Dated: July 10, 2012  
New York, New York

SO ORDERED:

  
WILLIAM H. PAULEY III  
U.S.D.J.

*All Counsel of Record.*